

Board of Chosen Freeholders
Of The County of Burlington
MOUNT HOLLY, NEW JERSEY

08060

DEPARTMENT OF PUBLIC SAFETY
Emergency Management
Central Communications
Forensic Science Laboratory
First Aid Academy

November 19, 1996



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Secretary, FCC
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RE: Advanced Television System
and Their Impact Upon the
Existing Television Broadcast Service

MM Docket No. 87-268
Sixth Further Notice 96-317

Dear Chairman Hundt:

Burlington County NJ wishes to express its strong support for Federal Communications action to reallocate the current UHF broadcast television channels 60-69, and make a portion of that spectrum available for public safety use. The first step in the process is reallocation of UHF channels 60-69 as proposed by your staff in the above referenced digital television proceeding.

There is currently an urgent need in many parts of the country for additional public safety radio channels. The Public Safety Wireless Advisory Committee (PSWAC) co-sponsored by the FCC and the NTIA recently released its Final Report which found that public safety agencies need at least 2.5 MHz of additional spectrum right now for interoperability, at least 25 MHz within five years, and an additional 70 MHz within the next fifteen years.

Burlington County NJ agrees with the PSWAC findings. In our area of the country there are no additional radio channels available for the expansion of existing systems nor for the implementation of new ones. Those of us having a mandate to provide life and property protection communications services are stifled by this lack of spectrum. Only immediate FCC action in making available new spectrum can help alleviate the problems faced by Burlington County NJ and many other public safety agencies around the nation.

The spectrum within channels 60-69 is ideal for public safety use. This block of UHF channels is adjacent to the 800 MHz mobile radio frequencies heavily used by public safety agencies.

While we support the allocation of additional 800 MHz spectrum for public safety, we also alert the Commission to problems with the current DTV channel planning as it affects land mobile users of the 500 MHz shared TV channels 19 and 20 in the New Jersey and Eastern Pennsylvania area.

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Secretary, FCC

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Burlington County NJ is currently licensed to operate public safety radio communications on frequencies derived from the sharing of the TV channels under 47 CFR, Part 90, Subpart L, Authorization In the Band 470-512 MHz (UHF-TV Sharing) of the FCC Rules. Ten radio channels in this band provide the delivery of life saving and property protection services of 162 police, fire and emergency medical agencies to a population of approximately 400,000 citizens and workers located in a 827 square mile area of New Jersey. This 24 hour per day, public safety radio system, installed at great cost to taxpayers is essential to preserving the health and welfare of the general public. The Commission's proposal to allow a TV broadcast station to operate on adjacent TV channel 18 and 21 frequencies in Secaucus and Vineland, New Jersey would create harmful interference to our public safety communications, thus jeopardizing our ability to deliver the life safety and property protection services to which we are bound by law or charter.

We call to the attention of the Commission that the docket identifies separation of the proposed TV station from the center of the urbanized area, in this instance Philadelphia, PA, as less than the technically appropriate 110 miles between the broadcast operation site and the nearest adjacent channel land mobile site. In fact, channel 18 in Secaucus, New Jersey will be less than 80 miles from center city Philadelphia. Channel 21 in Vineland would be located just a little over 32 miles from center city. However, we respectfully remind you that the allocation for use of the public safety communications channels derived from TV channels 19 and 20 extends outward in a 50 mile radius of the center of the urbanized area. Further, the Commission has granted waivers of this "50 mile rule" in support of public safety operations, further expanding the radius to as much as 60 miles. Thus the distance from the currently licensed operations and the proposed adjacent DTV channel is not the desired 110 miles, but considerably less as evidenced below.

Our radio system, which operates on channels in the TV Channel 19 spectrum, will be impacted by interference from the proposed implementation of TV Channel 18 in Secaucus, New Jersey. The geographical coordinates of this proposed DTV transmitter is 40-42-43N, 74-00-49W. Just one of our currently licensed Burlington County New Jersey transmitter sites is located at the geographical coordinates 40-01-03N, 74-49-00W. This is a separation of only 63.92 miles. It is our position that such close spacing of interfering transmitters will jeopardize the delivery of services for the protection of life and property of the general public.

We also urge the Commission not to eliminate use of Channel 20 for land mobile service in the Philadelphia region. Many public safety agencies have implemented operations on these channels at a great expenditure of public funds.

Secretary FCC

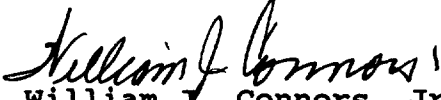
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We respectfully ask you to consider the impact of this proceeding on the public safety entities operating on TV channels 19 and 20. With no other channel availability, where in the radio spectrum would they move? Who would pay for this? Is it fair and appropriate to expect the local tax base to absorb such a mandate? Is this compliant with Congressional mandates?

Burlington County NJ urges the Commission to act expeditiously and favorably in this matter.

Sincerely,


William J. Connors, Jr.
Director Public Safety

WJC:cw

cc: Senator William Bradley
Senator Frank Lautenberg
Senator Elect Robert Torrecelli
Congressman H. James Saxton
Congressman Christopher Smith
Mr. Coltri, National APCO
Mr. Galdo, County Administrator
Mr. DeLaRoi, Management Specialist
Mr. Schuler, SSI
Mr. Reynolds, Emergency Management Coordinator
Mr. Matheson, 9-1-1 Coordinator
Mrs. Gavio, Assistant 9-1-1 Coordinator
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